

In re: Tri-State Paper, Inc., *Debtor*.

Tri-State Paper, Inc., *Plaintiff*,

v.

Moccia's Train Stop, Inc., *Defendant*.

**United States Bankruptcy Court
Eastern District of Pennsylvania**

Case No. 23-13237-pmm
Chapter 11

Adversary No. 24-00016-pmm

Plaintiff's Request for Default Judgment Against Defendant Moccia's Train Stop, Inc.

To the Clerk of Court:

You must enter judgment against Defendant Moccia's Train Stop, Inc. according to Fed. R. Bankr. P. 7055, Fed. R. Civ. P. 55(b)(1), and the declaration below.

Date: April 26, 2024

CIBIK LAW, P.C.
Counsel for Plaintiff

By: *Es/ Michael I. Assad*

Michael A. Cibik (#23110)
Michael I. Assad (#330937)
E.J. Gruber (#334339)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com

Declaration

1. I am an attorney for Plaintiff Tri-State Paper, Inc. in the above-captioned action.
2. I am familiar with the file, records, and pleadings in this matter.
3. The Clerk entered default against the Defendant for its failure to appear, plead, or otherwise defend against the Plaintiff's complaint for judgment for affirmative relief within the time allowed.
4. The amount justly due and owing to the Plaintiff from the Defendant is \$2,268.06, plus costs in the amount of \$350.00, for a total of \$2,618.06 sum certain.
5. The Defendant is not in military service as defined by 50 U.S.C. § 3911 and is not a minor or person with special needs.
6. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Date: April 26, 2024

Es/ Michael I. Assad

Michael I. Assad

Certificate of Service

Service on the Defendant is not required pursuant to Fed. R. Bankr. P. 7005 and Fed. R. Civ. P. 5(a)(2), thus no certificate of service is included.